


AFFIDAVIT OF ALLEN FRANK GLOVER

STATE OF Florida)

COUNTY OF Duval)

BEFORE ME, the undersigned, personally appeared ALLEN GLOVER, who produced DLA 009113133 (form of identification)/personally known to me, and who after being first duly sworn, deposes and says:

1. I, ALLEN GLOVER am over the age of eighteen (18) and can truthfully and competently testify to the matters contained herein based upon my personal knowledge.
2. The factual statements contained herein are true and correct to the best of my knowledge, information, and belief.
3. I currently reside in BEAUFORT COUNTY, SOUTH CAROLINA
4. I committed perjury during my grand jury testimony regarding my involvement as the hitman in the murder for hire.
5. I committed perjury during my trial testimony regarding my involvement as the hitman in the murder for hire.
6. Following Joseph Maldonado-Passage's trial, I reported to the Department of Justice that I didn't tell the truth at trial and information regarding Jeff Lowe and sex trafficking. The person I spoke with never returned my call.
7. Jeff Lowe wanted full ownership of the park and wanted Joseph Maldonado-Passage off the park by any means necessary.
8. Before Joseph Maldonado-Passage was being investigated by the federal government, Jeff Lowe asked me to kill Joseph Maldonado-Passage. He told me that I would never have to work again if I killed Joseph Maldonado-Passage.



9. Before Joseph Maldonado-Passage was being investigated by the federal government, Jeff Lowe told me that he wanted Carole Baskin dead and discussed ways to do it so that he would get full ownership of the park.
10. Jeff Lowe agreed to the plot to have Joseph Maldonado-Passage killed. The plan was to tie a wire between two poles on a path that was frequently traveled by Joseph Maldonado-Passage as he drove from his house to the office so that it would decapitate him. I took Jeff Lowe to the area and showed him where the wire would be set up.
11. Jeff Lowe had many plans to get Joseph Maldonado-Passage out of the picture, he told me that he was going to put Joseph Maldonado-Passage behind bars for committing fraud. Jeff approached Joseph Maldonado-Passage about the alleged fraud and recorded it. This conversation was faked in an effort to put Joe in jail. When this failed, he worked with United States Fish and Wildlife agent Matthew Bryant to create, direct and coerce the murder for hire plot.
12. Joseph Maldonado-Passage always joked about wishing Carole Baskin was gone because of the financial stress she caused him. No one ever took him seriously. If I offered to do it myself, as Jeff Lowe suggested then I would have an opportunity to get off the park.
13. Jeff Lowe approached me with the idea that Joseph Maldonado-Passage was looking for someone to kill Carole Baskin.
14. Jeff Lowe wanted Carole Baskin dead and asked me to talk to Joseph Maldonado-Passage, ask him if he wanted her dead and offer myself as a hitman.
15. Jeff Lowe told me that if I got in trouble for the "hit of Carole Baskin" that he would make sure I would be the richest man in prison.
16. I testified at trial that I was going to kill Carole Baskin by cutting her head off. This was the same method that Jeff and I discussed when planning how to kill Joseph Maldonado-Passage.

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17. Jeff Lowe created the entire murder for hire plot from start to finish.
18. I never intended to kill Carole Baskin. I was never going to kill Carole Baskin. I never engaged in an overt act to kill Carole Baskin.
19. Around October of 2017, I wanted to leave Greater Wynnewood Exotic Animal Park and return home to South Carolina because Joseph Maldonado-Passage and I were not getting along.
20. On November 25, 2017, I returned to South Carolina to spend time with my family, work for Jeff Lowe, and reinstate my driver's license. I left the park on my own for personal reasons.
21. I stole \$3,000 from Joseph Maldonado-Passage and left to go home to South Carolina.
22. I testified at trial that this \$3,000 came from the cub sale on November 24, 2017. This is not accurate as I have no knowledge of the park finances and have no knowledge of where the \$3,000 came from that I stole.
23. I would have traveled to South Carolina regardless of stealing the \$3,000 from Joseph Maldonado-Passage.
24. I purchased my airline ticket to South Carolina with my own money. I asked a woman working in the office at the park to use the computer and purchase the ticket for me. I did not purchase the ticket so that I could travel to Florida and kill Carole Baskin, but rather because I wanted to go back home to South Carolina. My plan to leave the park was not a secret.
25. I traveled to Florida for a couple of days but I didn't travel to Florida to warn Carole Baskin of the murder for hire or to stalk her or to kill Carole Baskin. I made the short trip to Florida to party completely unrelated to Carole Baskin.
26. On February 26, 2018, my roommate in South Carolina, helped me draft text messages to send to Jeff Lowe regarding expenses from my trip to Florida. These expenses were made up so that I

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didn't have to pay back the \$3,000. I never sent this information to Joseph Maldonado-Passage nor did he ask about it.

27. Joseph Maldonado-Passage did not give me the phone assigned to the Pizzeria. I took the phone from a recently fired employee named AJ.

28. I testified that Joe took my phone from me and mailed it to Vegas; however, Jeff Lowe instructed me to give my phone to Joseph Maldonado-Passage and to ask him to mail it to Jeff's Las Vegas address.

29. James Garretson set up the entire fake ID plan. I never used the fake ID.

30. The entire time I was off the park from November 25, 2017 to July 6, 2018, I never discussed the murder for hire plot with Joseph Maldonado-Passage or anyone while I was gone.

31. Upon my return to Oklahoma Jeff Lowe began instructing me what to say, how to say it and what to do in order to have Joseph Maldonado-Passage indicted for murder. He told me that I needed to be on the government's side and not Joe's side.

32. Jeff Lowe rehearsed the story with me multiple times.

33. Jeff Lowe prepared me and told me what to say before I interviewed with the agents at the park.

34. Jeff Lowe told me that he wanted me to keep his name out of it.

35. During my conversations with Jeff Lowe on June 17, 2018, and June 21, 2018, I was trying to say what I thought Jeff Lowe wanted me to say.

36. During the June 17, 2018, call I was instructed by Jeff Lowe to make sure Joseph Maldonado-Passage took the fall for the murder for hire plot and he told me not contact Joseph Maldonado-Passage.

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37. These phone calls with Jeff Lowe were set up and staged. Jeff Lowe lied to me about recording these calls. The statements I made were not true, but were statements made at the direction of Jeff Lowe in order to indict Joseph Maldonado-Passage.
38. During my interview with Matt Bryant on July 13, 2018, Matthew Bryant made sure that I got my story straight about what they had planned since my stories were inconsistent with Jeff Lowe. This was because I was trying to make sure I said what Jeff wanted me to say.
39. Around December of 2018, I told Agent Matthew Bryant to contact my roommate in South Carolina to verify my whereabouts regarding when I got to South Carolina, when I traveled to Florida, and when I left South Carolina. To my knowledge, Agent Bryant never reached out to my roommate to confirm my whereabouts.
40. Agent Matthew Bryant, Amanda Maxfield-Green, and her supervisor, who was a short male, prepared me for my trial testimony. They told me during trial prep that If I did what they asked then no charges would be brought against me now or in the future. This meeting was either typed or recorded but was not provided to me.
41. Agent Matthew Bryant and others, including Jeff Lowe repeatedly told me not to text to avoid putting things in writing.
42. None of this information was previously disclosed because Amanda Maxfield Green and Agent Matthew Bryant wanted my testimony to fit Jeff Lowe's murder plot.
43. Amanda Maxfield Green and Agent Matthew Bryant instructed me what to say to make sure that my story matched theirs to ensure Joe was put in prison. During this meeting they discussed trial strategy and all the individuals who would be testifying at trial.

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44. Following Joseph Maldonado-Passage's arrest, I learned from Eric Yano, co-owner of Jeff's new zoo, that Jeff Lowe bragged to him that he got more than the \$3,000 from Allen and successfully put Joe in prison.
45. In February of 2017, I had a sexual relationship with Ashley Webster while she was living and working at the Greater Wynnewood Exotic Animal Park. I did not disclose my relationship with this witness at any time to the government. On March 25, 2019, Agent Matthew Bryant became aware of this relationship and never disclosed it.
46. James Garretson would offer me prostitutes, but I subsequently learned that federal agents were texting me pretending to be prostitutes.
47. I have personal information about James Garretson, Jeff Lowe and/or Lauren Lowe involving sex trafficking and credit card fraud.
48. I have personal information of fraud committed by Jeff and/or Lauren Lowe relating to other people's property.
49. Joseph Maldonado-Passage's trial attorneys at the public defender's office never requested my deposition or a meeting. I never spoke with them at all.
50. I voluntarily provided all of my cell phones to Phillips & Hunt. I was not provided anything in exchange for this affidavit.

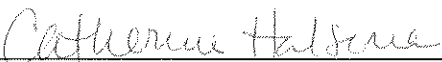
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FURTHER AFFIANT SAYETH NOT


Allen Frank Glover

9.10.21

Date


Notary Public

9.10.21

Date

Catherine Halsema
Type or Print Name
My Commission Expires:

